

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

10 JAN 23 PM 2:46

UNITED STATES OF AMERICA

v.

Case No.: 2:24-cr-85-CR-1-2-3-4-5-6-
7-8-9-10

HUSSEIN IMAN, a.k.a. "Q,"
JOSEPH CADORETTE, II,
ABDIRAHMAN ADEN,
MARCUS SANTIAGO,
MICHAEL BERNIER,
AMANDA DELISLE,
CHRISTINA BYRD,
[REDACTED],
[REDACTED] and
ANTHONY MATARAZZO
Defendants.

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U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED
1/31/2025
BY [Signature]
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SECOND SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE

Between on or about April 1, 2024 and continuing to on or about July 24, 2024, in the District of Vermont and elsewhere, defendants HUSSEIN IMAN, a.k.a. "Q," and JOSEPH CADORETTE, II knowingly and intentionally combined, conspired, confederated and agreed together and with each other, and with other persons known and unknown to the grand jury, to unlawfully and knowingly use and maintain a place located at 2022 Pleasant Street in Williamstown, Vermont for the purpose of distributing and using a controlled substance, in violation of 21 U.S.C. § 856(a)(1).

(21 U.S.C. §§ 846, 856(a)(1))

COUNT TWO

In or about May 2024, in the District of Vermont and elsewhere, defendants HUSSEIN IMAN, a.k.a. "Q," and ABDIRAHMAN ADEN knowingly and intentionally combined, conspired, confederated and agreed together and with each other, and with other persons known and unknown to the grand jury, to distribute fentanyl, a Schedule II controlled substance.

(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C))

COUNT THREE

On or about April 5, 2024, in the District of Vermont and elsewhere, defendants HUSSEIN IMAN, a.k.a. “Q,” and ANTHONY MATARAZZO knowingly and intentionally distributed fentanyl and cocaine base, both Schedule II controlled substances.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 18 U.S.C. § 2)

COUNT FOUR

On or about April 19, 2024, in the District of Vermont and elsewhere, defendants HUSSEIN IMAN, a.k.a. "Q," JOSEPH CADORETTE, II and [REDACTED] knowingly and intentionally distributed fentanyl, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 18 U.S.C. § 2)

COUNT FIVE

On or about May 9, 2024, in the District of Vermont and elsewhere, defendants HUSSEIN IMAN, a.k.a. "Q," and [REDACTED] knowingly and intentionally distributed fentanyl, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 18 U.S.C. § 2)

COUNT SIX

On or about May 29, 2024, in the District of Vermont and elsewhere, defendants HUSSEIN IMAN, a.k.a. "Q," and ABDIRAHMAN ADEN knowingly and intentionally used a communication facility, that is, a cellular telephone, in committing, causing, and facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 841(a)(1), that is, the distribution of fentanyl, a Schedule II controlled substance.

(21 U.S.C. §§ 843(b), 841(b)(1)(C), 18 U.S.C. § 2)

COUNT SEVEN

On or about July 9, 2024, in the District of Vermont and elsewhere, defendants HUSSEIN IMAN, a.k.a. "Q," and MARCUS SANTIAGO knowingly and intentionally distributed fentanyl, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 18 U.S.C. § 2)

COUNT EIGHT

Between in or about February 2024 and in or about June 2024, in the District of Vermont and elsewhere, defendants HUSSEIN IMAN, a.k.a. "Q," MICHAEL BERNIER and AMANDA DELISLE did knowingly combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit: to knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, which involved the proceeds of a specified unlawful activity, that is fentanyl and cocaine base trafficking, with the intent to promote the carrying on of specified unlawful activity, that is fentanyl and cocaine base trafficking, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

(18 U.S.C. §§ 1956(a)(1)(A)(i), 1956(h))

COUNT NINE

Between in or about March 2024 and in or about April 2024, in the District of Vermont and elsewhere, defendants HUSSEIN IMAN, a.k.a. “Q,” and CHRISTINA BYRD, knowingly and intentionally combined, conspired, confederated and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to possess with intent to distribute and distribute fentanyl and cocaine base, both Schedule II controlled substances.

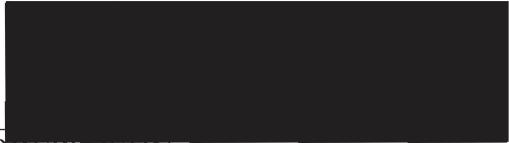
(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C))

COUNT TEN

Between in or about October 2023 and in or about July 2024, in the District of Vermont and elsewhere, defendants HUSSEIN IMAN, a.k.a. "Q," and [REDACTED] knowingly and intentionally combined, conspired, confederated and agreed together and with each other, and with other persons known and unknown to the grand jury, to distribute fentanyl, a Schedule II controlled substance.

(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C))

A TRUE BILL

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FOREPERSON



MICHAEL P. DRESCHER (MPD, CGO)
Acting United States Attorney
Burlington, Vermont
January 23, 2025